

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

IN THE MATTER OF THE APPLICATION : **18 - 2007 JMC**
OF THE UNITED STATES : **NOS.** _____
OF AMERICA FOR A SEARCH WARRANT :
REQUIRING DISCLOSURE OF :
HISTORICAL CELLULAR SITE INFO. :

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A SEARCH WARRANT
REQUIRING DISCLOSURE OF HISTORICAL CELLULAR SITE INFORMATION**

Mohammed Ali, a Task Force Officer with the Federal Bureau of Investigation ("FBI")
being duly sworn, states:

1. This affidavit is being submitted in support of an application for a search warrant to search the records of AT&T, Sprint, T-Mobile, and Verizon Wireless ("the Service Providers") to disclose certain records and other information pertaining to the cellular telephone towers described in Part I of Attachment A. The records and other information to be disclosed are described in Part II of Attachment A.

2. The applied for warrant would authorize the analysis of the transactional records for the purpose of identifying the individuals responsible for the armed robberies at the specified locations described in this affidavit, by members of the FBI, or their authorized representatives, including but not limited to other law enforcement agents assisting in the above described investigation.

3. Because this affidavit is being submitted for the limited purpose of establishing probable cause for a search warrant, I have not included every detail of every aspect of the investigation. Rather, I have set forth only those facts that I believe are necessary to establish probable cause. I have not, however, excluded any information known to me that would defeat a

determination of probable cause. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents, police officers, witnesses, cooperating sources, telephone records, and reports. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

4. Based on the facts set forth in this affidavit, there is probable cause to believe that violations of 18 U.S.C. § 1951 - Hobbs Act Robbery, and 18 U.S.C. § 924(c) – Possession of a Firearm During and in Relation to a Crime of Violence, have been committed by the unknown subjects described herein. There is also probable cause to believe that a search of the cell tower data as described below and in Attachment A will result in identification of the subjects and the recovery of items constituting evidence of this criminal violation.

AGENT BACKGROUND

5. I am a Task Force Officer with the FBI and a Detective with the Baltimore Police Department (“BPD”). As such, I am a law enforcement officer of the United States within the meaning of Section 2510 (7) of Title 18, United States Code, that is, an officer of the United States who is empowered by law to conduct investigations of, and to make arrests for, federal felony offenses, including violations of Title 18 U.S.C. § 1951. Your affiant has been and is a sworn Police Officer since 2001, and a Task Force Officer with the FBI’s Baltimore Field Office since 2016. Your affiant is currently assigned to the FBI Joint Violent Crimes Task Force, Baltimore, Maryland domicile, comprised of Detectives from the Baltimore Police Department (“BPD”) and Baltimore County Police Department (BCPD). Your affiant has participated in numerous investigations focused on violent crimes, including bank and armored carrier robberies, Hobbs Act

violations / commercial armed robberies, street robberies, and the apprehension of state and federal fugitives. In my capacity as a Task Force Officer with the FBI, I am authorized to obtain and serve federal search warrants.

PROBABLE CAUSE

6. The FBI and BPD are conducting an investigation of several armed commercial robberies that occurred in June 2018. Your affiant believes that these were committed by the same subjects. A review of available surveillance video indicated the robberies appeared to be related based upon the description of the subjects, articles of clothing and accessories worn by the subject, weapons used by the subject and the manner in which the robberies were committed, as well as the property taken by the suspects.

7. On June 5, 2018, at approximately 4:52 p.m., a black male subject entered the Quick Mart store, located at 3407 Hamilton Avenue, Baltimore, Maryland 21214. The subject walked to the front of the counter and inquired about the price of candy. The subject then withdrew a long barrel revolver and demanded money. Fearing for his safety, the store employee complied and handed the subject the cash from the business. The subject then robbed two customers inside of the store who were in the Lottery area. The subject then fled location on foot. This incident was captured on store surveillance video.

8. On June 7, 2018, at approximately 9:13 p.m., two black male subjects approached the owner of Sal's Deli and Grocery, located at 1201 N. Potomac Street, Baltimore, Maryland 21213, who was standing outside in front of the store. One of the subjects withdrew a long barrel revolver, pointed it at the owner, and demanded that he go inside of the store. The subjects then demanded money. Fearing for the safety of his son who was behind the counter, the owner

instructed his son to open the cash register and give the subjects all of the money in the register. The subjects then walked behind the counter and took approximately \$1,500.00 in U.S. currency. The two subjects then fled the scene in a red four door vehicle. This incident was captured on store surveillance video.

9. On June 15, 2018, at approximately 7:31 p.m., two black male subjects entered the Hobbits Liquor store, located at 4517 Bowleys Lane, Baltimore, Maryland 21206. One subject approached the counter, displayed a long barrel revolver, and demanded money. The second subject walked behind the counter, opened three cash registers, and took the money contained inside. The subjects then fled the location. This incident was captured on store surveillance video.

10. On June 18, 2018, at approximately 7:55 p.m., two black male subjects entered the Limetree Liquor store, located at 1720 E. Northern Parkway, Baltimore, Maryland 21239, armed with a long barrel revolver and announced a robbery. The subjects walked behind the counter and removed approximately \$3,000.00 in U.S. currency from the cash registers and several cartons of cigarettes. The subjects then fled the location on foot down a step of steps heading towards Meridene Road. This incident was captured on store surveillance video.

11. On June 23, 2018, at approximately 10:10 p.m., three black male subjects entered Hamilton Liquors, located at 5418 Harford Road, Baltimore, Maryland 21214. The subjects approached the counter, displayed a long barrel revolver, and demanded money. Employees, fearing for their safety, complied and opened the cash registers. The subjects gathered the money and fled the location. This incident was captured on store surveillance video.

12. On June 24, 2018, at approximately 10:51 p.m., two black male subjects entered Sal's Deli and Grocery, located at 1201 N. Potomac Street, Baltimore Maryland 21213, armed

with a long barrel revolver and attempted to walk behind the counter. Fearing for his safety and that of his son, the owner withdrew a shotgun to defend himself. The subject armed with the revolver discharged his weapon, striking the owner's son. The subjects then fled the location on foot. This incident was captured on store surveillance video. Review of the store surveillance video revealed that the subjects are the same subjects who robbed this business on June 7, 2018.

13. On June 25, 2018 at approximately 6:42 p.m., a black male subject entered the Crown Grocery store, located at 3721 S. Hanover Street, Baltimore, Maryland 21225. The subject withdrew a long barrel revolver from a red and black bag and demanded money. Fearing for his safety, an employee complied and handed-over approximately \$1,200.00 in U.S. currency and several cartons of cigarettes. The subject then fled the location on foot. This incident was captured on store surveillance video.

14. In each of the above referenced incidents, the businesses involved received and sold goods that were received in interstate commerce. In each of the robberies the subjects committed or threatened to commit acts of violence by producing a weapon, pointing a weapon, or discharging a weapon at the victims.

15. Based on the evidence gathered to date and my knowledge, training, and experience, I believe that the suspects described above conspired to commit the nine robberies listed above. I know that individuals involved with firearms offenses and Hobbs Act robberies frequently use cellular telephones, communication devices, and other electronic media storage to further their illegal activities. Your Affiant knows that it is not uncommon for suspects to communicate via cellphone before, during and after a robbery has been committed in order to coordinate their planning and commission of the robbery as well as to coordinate their flight from

the scene of the crime. Your affiant has investigated multiple Hobbs Act robberies in which the subjects have used two way communications and believes the subjects in the above described robberies did the same.

16. Based on the above, your affiant believes the information requested in the search warrant can assist in identifying the suspect or suspects and as evidence in court for the crime of Hobbs Act Robbery.

FACTS ABOUT CELL TOWERS IN GENERAL

17. Many cellular service providers maintain antenna towers ("cell towers") that serve specific geographic areas. Each cell tower receives signals from wireless devices, such as cellular phones, in its general vicinity. These cell towers allow the wireless devices to transmit or receive communications, such as phone calls, text messages, and other data. The tower closest to a wireless device does not necessarily serve every call made to or from that device.

18. In addition to a unique telephone number, each cell phone is identified by one or more unique identifiers. Depending on the cellular network and the device, the unique identifiers for a cell phone could include an Electronic Serial Number ("ESN"), a Mobile Electronic Identity Number ("MEIN"), a Mobile Identification Number ("MIN"), a Subscriber Identity Module ("SIM"), a Mobile Subscriber Integrated Services Digital Network Number ("MSISDN"), an International Mobile Subscriber Identifier ("IMSI"), or an International Mobile Equipment Identity ("IMEI").

19. Cellular service providers routinely maintain historical cell-tower log information, including records identifying the wireless telephone calls and communications that used a particular tower. For each communication, these records may include the telephone call number

and unique identifiers for the wireless device in the vicinity of the tower that made or received the communication ("the locally served wireless device"); the source and destination telephone numbers associated with the communication (including the number of the telephone that called or was called by the locally served wireless device); the date, time, and duration of the communication; the "sectors" (i.e., the faces of the towers) that received a radio signal from the locally served device; and the type of communication transmitted through the tower (such as phone call or text message).

PURPOSE OF THE SEARCH

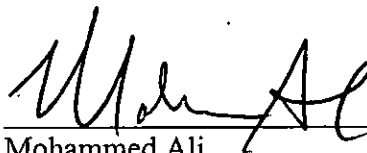
20. Based on the time of each robbery and the distance between each store, it is likely that only the subjects' mobile devices would have used the towers that served the areas near each of the commercial businesses described above. Identifying a mobile device that used those towers on the specified date and times would lead to the identification of the subjects. Each of the subjects' mobile devices would have a unique telephone number and Electronic Serial Number ("ESN"), which is registered to a respective carrier. The carrier would have identifying subscriber information, which can be used to identify the individual utilizing a specific mobile device. Upon identification of a mobile device, your affiant will obtain a subpoena to obtain the subscriber information from the respective carrier to further the investigation.

REQUEST FOR A SEARCH WARRANT

21. Given the facts set forth above, your affiant has probable cause to believe the records described in Attachment A would identify which wireless devices were in the immediate vicinity of the addresses listed in Attachment A around the time the robberies occurred in June 2018. This information, in turn, will assist law enforcement in determining the wireless devices

utilized by the subjects.

22. WHEREFORE, I respectfully request that the Court issue a warrant authorizing members of the FBI, or their authorized representatives, including but not limited to other law enforcement agents assisting in the above described investigation, to analyze the records, as described in Attachment A, for the purpose of identifying the individual responsible for the armed robberies described above.



Mohammed Ali
Task Force Officer
Federal Bureau of Investigation

Sworn to before me on this 20 day of July 2018.



J. MARK COULSON
UNITED STATES MAGISTRATE JUDGE

FILED _____ ENTERED _____
LOGGED _____ RECEIVED _____

AUG 15 2018

AT BALTIMORE
CLERK, U.S. DISTRICT COURT
DISTRICT OF MARYLAND
BY _____ DEPUTY

